

# Annual 47 C.F.R. § 64.2009(e) CPNI Certification

## EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010

1. Date filed: March 1, 2011
2. Name of company(s) covered by this certification: O1 Communications, Inc.
3. Form 499 Filer ID: 819698
4. Name of signatory: Jim Beausoleil
5. Title of signatory: Chief Financial Officer
6. Certification:

I, Jim Beausoleil, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed \_\_\_\_\_

**Attachments:**

Accompanying Statement explaining CPNI procedures

O1 COMMUNICATIONS, INC.  
STATEMENT REGARDING CUSTOMER PROPRIETARY NETWORK  
INFORMATION OPERATING PROCEDURES

February 26, 2011

This statement is filed on behalf of O1 Communications, Inc. ("O1" or "Company") pursuant to 47 C.F.R. § 64.2009(e) to demonstrate how O1's operating procedures are designed to ensure compliance with the Commission's CPNI rules.

**Certification**

O1 requires a corporate officer to act as agent for the company and to sign a compliance certificate on an annual basis stating that the officer has personal knowledge that the Company has established operating procedures which are adequate to ensure compliance with applicable CPNI rules.

**Use, Disclosure and Access to CPNI**

O1 does not use, disclose or permit access to its customers' CPNI except as any such use, disclosure or access is permitted by Section 222 of the Telecommunications Act of 1996.

**Use of CPNI for Marketing Purposes**

O1 does not use CPNI to market services to customers outside of the category of service to which the customer already subscribes. O1 also does not share CPNI with its affiliates or third parties for any marketing purposes. If, in the future, O1 seeks to use CPNI to market services to customers that are outside of the category of service to which the customer subscribes or to share CPNI with affiliates or third parties, O1 will provide notice to its customers advising them of their right to approve or disapprove of the proposed uses of CPNI. O1 will maintain a list of customer preferences.

O1 will ensure that all marketing campaigns using CPNI obtain receive prior approval. O1 will maintain records of all marketing campaigns that use CPNI in accordance with the FCC's rules.

**Call Detail information**

O1 has implemented a policy prohibiting the release of Call Detail Information to any customer during an in-bound call. If an O1 employee receives a request for Call Detail Information, he/she may provide that information to the caller by sending the information to the address of record or calling the customer back at the telephone number of record. O1 does not allow an employee to disclose any Call Detail Information to the customer other than the Call Detail Information that the customer already has disclosed.

**Safeguarding CPNI**

O1 takes the privacy and security of CPNI seriously. O1 has established authentication procedures applicable to incoming calls. O1 has also established detailed procedures for processing certain account changes and requires the applicable personnel to notify customers immediately of such account changes. O1 also has implemented network safeguards including but not limited to encrypting certain data. O1 does not have retail locations.

O1 also has implemented procedures for monitoring any unlawful attempts to gain access to its customers' CPNI. If O1 becomes aware that a pretexter has attempted to gain access to CPNI

within O1's possession, O1 will notify the FCC of any information that it obtains regarding a pretexter's attempts to gain access to CPNI as required by the FCC's rules.

**Employee Training**

O1 trains its employees as to when they are and are not permitted to use, permitted access to, or permitted to disclose CPNI O1 has a disciplinary process in place to address any noncompliance with its policies, including policies regarding CPNI, which includes the potential for termination.

**Customer Complaints**

O1 will track customer complaints that it receives regarding CPNI and will report those complaints per the categories identified in the FCC's rules.

**Notice of Security Breaches**

O1 will notify law enforcement and customers upon discovery of a breach of CPNI in accordance with 7 C.F.R. § 64.2011 (e). O1 maintains a record of all security breaches and notifications.